

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

**JOHN H. WILLIAMS, JR.
DEANNA L. WILLIAMS,**

DEBTORS.

**Case No.: BK-15-13717-JDL
Chapter 13**

OBJECTION TO CHAPTER 13 PLAN OF DEBTORS

Comes now the secured creditor, The Bank of New York Trust Company, N.A., as successor to JPMorgan Chase Bank, N.A., as Trustee, by their attorney, Jim Timberlake, and hereby objects to the Chapter 13 Plan of Debtors. In support of this Objection, The Bank of New York Trust Company, N.A., as successor to JPMorgan Chase Bank, N.A., as Trustee would show the Court as follows:

1. The Bank of New York Trust Company, N.A., as successor to JPMorgan Chase Bank, N.A., as Trustee is the holder of a purchase money note and mortgage on the real property, ("mortgaged property") of Debtors located at 4801 Coble St, Oklahoma City, OK 73135. Said note and mortgage has an estimated outstanding balance of \$129,949.76 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The proposed Chapter 13 Plan of the Debtors reflects an arrearage amount of \$0.00. The Bank of New York Trust Company, N.A., as successor to JPMorgan Chase Bank, N.A., as Trustee disputes this amount and would propose that the correct estimated arrearage amount is \$74,423.77.

3. It is the belief of The Bank of New York Trust Company, N.A., as successor to JPMorgan Chase Bank, N.A., as Trustee that the subject property is rental/investment property of the Debtors and the subject property is either unoccupied or generating income insufficient to

support the secured debt. Accordingly, the subject property is a burden on the estate and unnecessary to an effective reorganization

WHEREFORE, PREMISES CONSIDERED, secured creditor, The Bank of New York Trust Company, N.A., as successor to JPMorgan Chase Bank, N.A., as Trustee, moves the Court to reject the proposed Chapter 13 Plan of Debtors and/or to grant adequate protection or such other and further relief as may be entitled.

THE BANK OF NEW YORK TRUST
COMPANY, N.A., AS SUCCESSOR TO
JPMORGAN CHASE BANK, N.A., AS
TRUSTEE,

By: s/ Jim Timberlake
JIM TIMBERLAKE - #14945
Baer Timberlake, P.C.
4200 Perimeter Center, Suite 100
Oklahoma City, OK 73102
Telephone: (405) 842-7722
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Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on November 10, 2015.

John H. Williams, Jr.
DeAnna Williams
3320 Norcrest Drive
Oklahoma City, OK 73320

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John Hardeman
P.O. Box 1948
Oklahoma City, OK 73101

Gabriel Rivera
PO Box 7837
Moore, OK 73153-1837

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